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June 5, 2020

MEMO ENDORSED

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Neil Abromavage v. Deutsche Bank Securities Inc. et al (1:18-cv-06621)

Dear Judge Caproni:

We represent Defendants Deutsche Bank Securities Inc. ("DBSI"), Jeffrey Bunzel and Mark Hantho (collectively, "Defendants") in the above-referenced case. After consulting with Plaintiff's counsel, Defendants submit this joint request for an adjournment of the briefing schedule for Defendants' anticipated motion for summary judgment (the "Motion"). The present schedule, set by the Court in its April 27, 2020 Order [Dkt. No. 48], provides that the Motion shall be made by June 12, 2020, opposition shall be filed by July 16, 2020 and reply filed by August 6, 2020. The parties respectfully request an adjournment of the briefing schedule to provide that the Motion shall be made by July 10, 2020, opposition shall be filed by August 14, 2020 and reply filed by September 3, 2020.

The parties have been working collaboratively to resolve any remaining discovery issues, and in that spirit Defendants agreed to continue to search for a narrow set of documents discussed during two depositions near the close of fact discovery. Defendants made a small production of documents on May 19, 2020 and intend to make a final, small production early next week. Plaintiff has requested additional, limited depositions of Defendants Jeffrey Bunzel and Mark Hantho regarding the 2015 discretionary bonus decision process to the extent that the documents which were produced on and after May 19, 2020 bear on that issue, and Defendants do not object to this request. The parties would like to resolve any open discovery issues before commencing summary judgment motion practice. The parties respectfully request an adjournment of the Motion briefing schedule to allow sufficient time to take the additional depositions before the Motion is filed.

This is the second request for an adjournment of the Motion briefing schedule.



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Respectfully yours,

SEYFARTH SHAW LLP

/s/ Cameron Smith

Cameron Smith

cc: All counsel of record (via ECF)

Application GRANTED. No further extensions.

SO ORDERED.

Date: 06/08/2020

A handwritten signature in blue ink, reading 'Valerie Caproni'.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE